

## REMARKS

Applicant affirms the prior election without traverse and has canceled non-elected claims 22-28.

A proposed revised Figure 1 that shows a weave and a crack for items 10 and 28 is submitted for the Examiner's approval to overcome the objection to the drawings.

The rejection of claim 4 under §112 is traversed. Paragraph 14 clearly states that expansion allows the reaction to happen using the catalyst. The reference to creating has been changed to promoting to be more consistent with the function of a catalyst.

Claim 1 has been rejected as anticipated by Vincent USP 3,203,483. The liner in Vincent is a mild steel tube that is preformed with flutes to reduce its diameter for run in. It is externally coated with a material that hardens. The fluted tube is 5 inches diameter seamless pipe that is 1/8 inch thick (column 9 lines 13-15). This material is not flexible to the touch when installed. There is no teaching in this reference that the diameter of the liner when made cylindrical is larger than its perimeter when in the fluted condition. The specification states that the perimeter in the fluted condition is greater than the inside diameter of the surrounding casing suggesting that the liner may wind up under a compressive force but it is not enlarged from its original diameter from swaging (column 11 lines 10-35). Finally, the resin on the steel liner is stated to be .025 thick compared to a tubing thickness of .125. It can hardly be stated that this thin coating, even if it sets up has a meaningful effect on the rigidity of the overall wall structure. The purpose of the glass fibers and resin are to seal casing holes not to lend wall strength to the liner (column 12 lines 56-69). The liner is actually claimed to strengthen the casing that it is expanded into as opposed to expansion strengthening its wall. The liner is actually work hardened when forced into a smaller fluted profile and must be annealed to make it malleable before it is reformed into a cylindrical shape (column 10 lines 57-61). Again, this reference teaches away from making the wall more rigid from swaging. Claim 1 is not anticipated by this reference.

Claim 1 is rejected as anticipated by Bertet USP 5,695,008. Bertet adds heat using a hot fluid under pressure to cause polymerization (column 6 lines 51-55). Nothing gets more rigid in Bertet from expansion. Alternatively, Bertet embeds wires and applies heat

through them after expansion (column 7 lines 24-29). Again, nothing gets more rigid as a direct result of expanding.

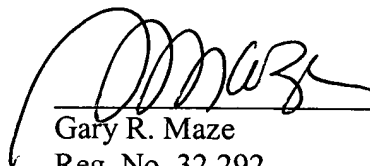
Claim 1 is rejected as anticipated by Guegen USP 5,494,106. This reference uses a preform that is folded over for run in and then subjected to internal pressure to change into a cylindrical shape. In its expanded condition its diameter corresponds to the inside diameter of the borehole or casing surrounding it (column 3 lines 52-56). After expansion heat is applied to harden the core 12. This reference fails to teach the wall getting rigid as a direct result of expanding. It further fails to teach expansion beyond the initial cylindrical dimension.

Claim 1 has been rejected as anticipated by Surjaatmadja USP 6,401,815. This reference uses a preformed sock that is preformed to a shape which closely conforms to the casing when inflated (column 3 lines 59-61). It fails to teach expansion beyond the initial cylindrical dimension.

Claim 1 is rejected as anticipated by Baugh USP 6,435,281. This reference uses a liner whose inner diameter when expanded into a circular shape is slightly larger than the inner diameter of the surrounding casing (column 3 lines 44-48). In essence, expansion does not get the liner bigger than its initial cylindrical dimension, by definition. Expanding this device does not make the liner more rigid. This liner is simply cemented after inflation. Mere expansion to a cylindrical shape from a folded shape does nothing to increase rigidity (column 3 lines 58-61). This claim is not anticipated by this reference.

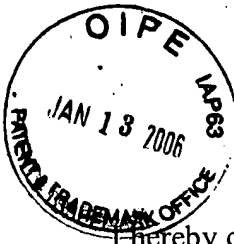
Allowance of all the claims is requested.

Respectfully submitted,



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Nacie Thigpen

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